

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 State Bar No. 11479  
4 KATHRYN C. NEWMAN  
5 Assistant Federal Public Defender  
6 Nevada State Bar No. 13733  
7 411 E. Bonneville, Ste. 250  
8 Las Vegas, Nevada 89101  
9 (702) 388-6577/Phone  
10 (702) 388-6261/Fax  
11 Kathryn\_Newman@fd.org

12 Attorney for William Pamintuan Craig

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 WILLIAM PAMINTUAN CRAIG,

19 Defendant.

20 Case No. 2:19-cr-00229-APG-EJY

21 **STIPULATION FOR PRETRIAL  
22 SERVICES TO RELEASE PASSPORT  
23 (First Request)**

24 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
25 Acting United States Attorney, and Richard Anthony Lopez, Assistant United States Attorney,  
26 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
and Kathryn C. Newman, Assistant Federal Public Defender, counsel for William Pamintuan  
Craig, that the Court should order Pretrial Services permission to release William Craig's  
passport to his wife after it confirms that he has self-surrendered to the BOP to serve his  
sentence.

27 This Stipulation is entered into for the following reasons:

28 1. William Craig appeared before the Court on an Arraignment and Plea pursuant  
29 to a plea agreement to an information on October 28, 2019. ECF No. 10. The Court released

1 William on a personal recognizance bond pending his sentencing date. ECF No. 9. The bond  
2 included the condition that he surrender his passport to the Office of Pretrial Services. *Id.*

3 2. William Craig complied with that condition and surrendered his U.S. Passport  
4 to the Pretrial Services Office. It remains in their custody.

5 3. William is scheduled to self-surrender to the U.S. Bureau of Prisons by noon on  
6 April 30, 2021. ECF No. 26. Absent a court order to the contrary, the Pretrial Services Office  
7 will return the passport to the Department of State after he reports to prison.

8 4. William is requesting the Court grant permission to the Office of Pretrial  
9 Services to release his passport to his wife, Leah Craig, after the office confirms that he has  
10 self-surrendered as ordered.

11 5. Counsel for the government has no objection to this request.

13 DATED this 19th day of April, 2021.

15 RENE L. VALLADARES  
16 Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

17 /s/ *Kathryn C. Newman*  
18 By \_\_\_\_\_  
19 KATHRYN C. NEWMAN  
Assistant Federal Public Defender

17 /s/ *Richard Anthony Lopez*  
18 By \_\_\_\_\_  
19 RICHARD ANTHONY LOPEZ  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
WILLIAM PAMINTUAN CRAIG,  
Defendant.

Case No. 2:19-cr-00229-APG-EJY

## ORDER

---

IT IS THEREFORE ORDERED

Craig's passport to his wife, Leah C

Prisons as ordered by this Court.

DATED this 20th day of April, 2021.

UNITED STATES DISTRICT JUDGE